

### Remarks

The Applicants note with appreciation the Examiner's helpful comments concerning the objection to the Specification and the rejections of the Claims under §112, first and second paragraphs. Claims 1, 5, 15 and 16 have accordingly been amended. Claims 3 and 4 have also been cancelled.

Claims 1 and 5 have been amended to add a reference to the drive means for driving the baffle plate and edge wiping nozzles to adjustably move the baffle plate and edge wiping nozzles toward and away from the strip material in accordance with the Examiner's helpful suggestion. Also, the text of Claims 1 and 5 regarding the controller has been amended to add that the controller controls the drive means to maintain the distance C as desired.

Claims 15 and 16 have been amended in accordance with the Examiner's helpful suggestion with respect to clarifying "clearance" C by revising it to read "distance" C. Withdrawal of the objection to the Specification and the rejection of the Claims under §112 is accordingly respectfully requested.

Turning now to the merits, we respectfully submit that Claims 5 – 6 and 15 – 16 distinguish over JP '441 and JP '966, whether taken individually or collectively. The Applicants were aware of JP '441 and describe it in the description of the related art section of the Specification. There are certain similarities of the apparatus disclosed in JP '441. Such similarities can be seen by reference to the JP '441 drawings.

However, there are significant and important differences not disclosed, taught or suggested. These differences are manifested in Figs. 6 and 7 of the Applicants' Drawings, for example, wherein the significant improvements brought about by the invention are visually shown. These advantages are brought about by virtue of the careful control of the claimed distances C and L within the

prescribed region as set forth in the equation contained within Claims 5 – 6 and 15 - 16 and as shown in Fig. 4 of the Drawings. The Applicants respectfully submit that this important difference is surely not taught or suggested by JP '441 and was, in fact, not appreciated at all.

The critical omission of JP '441 as it applies to Claims 5 – 6 and 15 - 16 resides with the failure to have an appreciation for the distance L. Careful scrutiny of the entire JP '441 disclosure, including the drawings, demonstrates a complete lack of identification of the L distance as having any importance. That distance is the distance between the end portion of the gas jet port of the edge wiping nozzle and the gas impingement point of the face wiping jet. This distance, in conjunction with distance C, when maintained within the equation set forth in Claims 5 – 6 and 15 - 16, brings about a superior result not previously contemplated in JP '441.

By virtue of the failure of JP '441 to appreciate the distance L, it inherently follows that such disclosure is inherently deficient with respect to providing adequate teachings to those of ordinary skill in the art to make modifications to JP '441 that could or would provide an advantage. In that regard, it is important in determining obviousness not only that there be teachings and/or suggestions to make a modification or modifications, but that one of ordinary skill in the art would have a reasonable expectation of success in making such a modification. Unfortunately, JP '441 fails both prongs of this fundamental test. There is simply no teaching or suggestion in JP '441 that there is any importance whatsoever associated with distance L, much less any teachings or suggestions that the distance L, when taken in conjunction with distance C, would have any effect at all. Also, JP '441, by virtue of its silence on distance L, would provide one of ordinary skill in the art with no expectation of success, much less a reasonable expectation of success.

Unfortunately, JP '966 also utterly fails to have any appreciation for the distance L. Careful scrutiny of the entire disclosure reveals a complete lack of appreciation for the distance L, which

inherently results in a deficiency with respect to providing teachings to those of ordinary skill in the art to make modifications to either JP '966 or JP '441 that could or would provide an advantage.

As was the case with JP '441, one of ordinary skill in the art would not have a reasonable expectation of success in making any modifications because both JP '441 and JP '966 place any importance whatsoever with the distance L, much less any teachings or suggestions that the distance L, when taken in conjunction with distance C, would have any effect at all. By virtue of the complete silence on distance L in JP '966, one of ordinary skill in the art would have no expectation of success, much less a reasonable expectation of success by either hypothetically combining JP '966 with JP '441. We therefore respectfully submit that the hypothetical combination of JP '966 with JP '441 cannot support a rejection of Claims 5 – 6 and 15 - 16 under §103. Withdrawal of that rejection is respectfully requested.

There are additional reasons supporting patentability of Claims 5 – 6 and 15 – 16. It is important that JP '441 and JP '966 approach the edge wiping task in a completely different manner.

This completely different approach would cause one of ordinary skill in the art not to make the hypothetical combination as set forth in the rejection. In that regard, we invite the Examiner's attention to JP '441 and the edge wiping nozzle which is oriented substantially parallel to the travel direction of the strip. This causes the wiping gases to proceed substantially parallel to the edge of the strip in the direction of the travel of the strip.

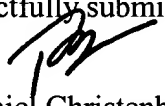
In sharp contrast, the edge wiping nozzle of JP '966 is oriented such that it is substantially perpendicular to the direction of travel of the strip. As a consequence, the wiping gases proceed substantially perpendicularly to the edge of the strip. This radical difference in orientation of the nozzle changes everything and would cause one of ordinary skill in the art not to make the hypothetical combination. The gas velocities and distances would no doubt be completely different,

as well as the effect of such velocities and distances because of the completely different approach and the manner in which excess bath material would travel along or across the strip, depending on the direction of application of the wiping gases. Thus, one of ordinary skill in the art would have no incentive to make the hypothetical combination in the first place.

In any event, even if the hypothetical combination was made, one of ordinary skill in the art would, in keeping with the distances  $X_a$  and  $X_b$ , orient the edge wiping nozzles in the manner taught by JP '966 to have the proper distances as taught by distances  $X_a$  and  $X_b$ . Unfortunately, this would result in an apparatus completely different from that recited in Claims 5 – 6 and 15 - 16. Those claims specifically recite that the edge wiping nozzles are disposed for jetting a gas in a widthwise direction relative to the strip material and substantially parallel to the adjacent edge of the strip material. This is completely different from an apparatus resulting from a hypothetical combination of JP '966 with JP '441. That apparatus would have edge wiping nozzles positioned for jetting a gas substantially perpendicular to each adjacent edge and strip material. Withdrawal of the §103 rejection as it applies to Claims 5 – 6 and 15 – 16 is respectfully requested.

In light of the foregoing, we respectfully submit that the entire Application is now in condition for allowance, which is respectfully requested.

Respectfully submitted,

  
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